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5 Attorneys for Defendant
6 REACTION NUTRITION, LLC
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

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11 THERMOLIFE INTERNATIONAL,
LLC

12 v. Plaintiff,
13 BETTER BODY SPORTS, LLC, et al,
14 Defendants.

15 CASE NO. CV12-09229 GAF (FFMx)
16 **STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN
30 DAYS (L.R. 8-3)**

17 Complaint served: November 15, 2012
Current response date: December 6, 2012
New response date: January 4, 2013

18 Action filed: October 26, 2012
Trial Date: None set

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1 WHEREAS, Plaintiff filed its Complaint on October 26, 2012;

2 WHEREAS, Defendant Reaction Nutrition, LLC (“Reaction Nutrition”) was
3 served with the Summons and Complaint on November 15, 2012;

4 WHEREAS, Reaction Nutrition’s response to the Complaint is due on
5 December 6, 2012;

6 WHEREAS, Reaction Nutrition’s counsel has requested, and Plaintiff’s
7 counsel has agreed to, a 30-day extension until January 4, 2013 for Reaction
8 Nutrition to respond to the Complaint;

9 WHEREAS, Reaction Nutrition submits that **good cause** exists for the
10 extension because Reaction Nutrition just recently retained undersigned counsel,
11 and undersigned counsel requires additional time to evaluate and investigate the
12 allegations and claims set forth in the Complaint;

13 WHEREAS, the Court has not established a discovery cut-off date, last date
14 for hearing motions, a pre-trial conference date, or trial date;

15 WHEREAS, the Court has not established a discovery cut-off date, last date
16 for hearing motions, a pre-trial conference date, or trial date;

17 WHEREAS, Reaction Nutrition submits that no party will be prejudiced by
18 the relief sought and Plaintiff agrees to the requested extension; and

19 WHEREAS, trial will not be delayed because the Court has not set any trial
20 date or other deadline in this case.

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1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, that
2 Reaction Nutrition's deadline to respond to the Complaint is extended to January 4,
3 2013. Reaction Nutrition lodges herewith a proposed Order for the Court's
4 consideration.

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6 Dated: December 5, 2012

VENABLE LLP

8 By: /s/ Daniel S. Silverman
9 Daniel S. Silverman
10 Attorneys for Defendant
11 Reaction Nutrition, LLC

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13 Dated: December 5, 2012

14 NEWPORT TRIAL GROUP

15 By: /s/ Scott Ferrell
16 Scott Ferrell
17 Attorneys for Plaintiff
18 Thermolife International, LLC

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